The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DEPARTMENT OF LABOR AND INDUSTRIES,
 	
                    Plaintiff,
 	
        v.
 	
GEO SECURE SERVICES, LLC.,
 	
                    Defendant.
	NO. 3:24-cv-05095-BHS
	
	SECOND DECLARATION OF ANASTASIA SANDSTROM

I, Anastasia Sandstrom, declare under the penalty of perjury under the laws of the United States that the following is true and correct.

1. I am over the age of eighteen and am otherwise competent to testify. I make these statements on personal knowledge and belief. I am the assistant attorney general assigned to represent the Department of Labor and Industries in the case against GEO Secure Services LLC (GEO).

2. L&I filed a motion for a contempt ruling on January 31, 2024 to enforce the warrant.

3. Attached are true and correct copies of the following documents:

Ex. 1: Secretary of Labor v. The GEO Group, Inc., OSHRC Docket No. 12-1 381, Settlement Agreement (Dec. 20, 2013)

https://www.osha.gov/enforcement/cwsa/geo-group-inc-12202013

Ex. 2: Declaration of Elliott Furst

Ex. 3: Declaration of Eric Smith

SECOND DECLARATION OF
ANASTASIA SANDSTROM
NO. 3:24-CV-05095-BHS

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ATTORNEY GENERAL OF WASHINGTON
LABOR & INDUSTRIES DIVISION
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7740

1   Ex. 4: Deliberately Left Blank

2   Ex. 5: Application for Entry Warrant

3   Ex. 6: Declaration for Entry Warrant

4   Ex. 7: Entry Warrant

5   Ex. 8: Declaration of Nigel Turner

6   Ex. 9: *In re Gen'l Sec. Servs. Corp.* No. 96 W376, 1998 WL 960837

7   (Bd. of Indus. Ins. Appeals 1998)

8   Ex. 10: GEO Inspection History (part 1)

9   Ex. 11: GEO Inspection History (part 2)

10   Ex. 12: GEO Inspection History (part 3)

11   Ex. 13: Excerpts of 2015 GEO contract

12   Ex. 14: Letter about Suspension of Detainee Work Program

13   Ex. 15: Declaration of Amanda Soleil Maria Muñiz

14   Ex. 16: Excerpts of Performance-Based National Detention Standards 2011

15   DATED this 15th day of February, 2024 in Seattle, Washington.

16   ROBERT W. FERGUSON
                                       Attorney General
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19   ANASTASIA SANDSTROM
                                       Senior Counsel, WSBA No. 24163
                                       Attorney for Plaintiff
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SECOND DECLARATION OF   2   ATTORNEY GENERAL OF WASHINGTON
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